

BRAFMAN & ASSOCIATES, P.C.

ATTORNEYS AT LAW

767 THIRD AVENUE, 26TH FLOOR

NEW YORK, NEW YORK 10017

TELEPHONE: (212) 750-7800

FACSIMILE: (212) 750-3906

E-MAIL: ATTORNEYS@BRAFLAW.COM

BENJAMIN BRAFMAN

MARK M. BAKER
OF COUNSEL

MARC A. AGNIFILO
OF COUNSEL

ANDREA L. ZELLAN
JOSHUA D. KIRSHNER
JACOB KAPLAN
TENY R. GERAGOS
ADMITTED IN NY & CA
STUART GOLD

March 7, 2019

VIA ECF

The Honorable Nicholas G. Garaufis
United States District Judge
United States District Court
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Keith Raniere, 18 Cr. 204 (NGG)

Dear Judge Garaufis:

We write in response to the government's letter notifying the Court of what it asserts is a "potential conflict" with Teny Geragos' representation of Keith Raniere and Mark Geragos' representation of Clare Bronfman because they are "closely related." (Dkt. 390 at 1.) Counsel has made clear to both Raniere and the government that she is aware and takes seriously her ethical duties to her client—including the duties of confidentiality and loyalty. These duties have not and will not be impaired by her "close family relationship." (Id. at 2.) We do not believe there is a conflict; however, if the Court would like to conduct a Curcio hearing, we have provided Curcio counsel, Avraham C. Moskowitz, with the government's letter and are able to proceed with a hearing on the next court date, March 18, 2019.

Respectfully submitted,

/s/

Marc Agnifilo

Teny Geragos

cc: All Counsel (via ECF)